

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

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In re:

FRALEG GROUP, INC.,

Chapter 7

Case No.: 22-41410-jmm

Debtor.

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**ORDER (I) DIRECTING COMPLIANCE WITH THE ORDERS OF THE COURT  
DATED MAY 28, 2024 FOR THE TURNOVER OF INFORMATION AND  
DOCUMENTATION PERTAINING TO THE DEBTOR; AND (II) AWARDING THE  
TRUSTEE ATTORNEY'S  
FEES AND COSTS OF THIS MOTION**

Upon the motion [ECF Doc. No. \_\_\_\_] (the "Motion") having been made to this Court by Richard J. McCord, Esq. (the "Trustee") as the Chapter 7 Trustee of the estate of Fraleg Group, Inc. (the "Debtor"), by and through his counsel, Certilman Balin Adler & Hyman, LLP, for an pursuant to 11 U.S.C. §§105, 521(a)(3), (a)(4), 541(a)(1), 542(e), 543(b)(1) and Bankruptcy Rules 4002(a)(1), 9011, 9014 and 9016, for an Order (i) directing Andy Alege ("Alege"), Ron Fraser ("Fraser"), Andre Juman ("Juman") and/or a responsible party of the Debtor to cooperate with the Trustee and comply with the Orders of this Court dated May 28, 2024, to appear for examination and produce documents pursuant to the Subpoenas for Rule 2004 Examination and to turn over all documents correspondence and communications relating to the purchase of the real properties located at 112 North Walnut Street, East Orange, New Jersey ("112 North Walnut") and 116 North Walnut Street, East Orange, New Jersey ("116 North Walnut") (112 North Walnut and 116 North Walnut, collectively, "the Properties"); (ii) awarding the Trustee's Attorney's fees and costs of this Motion in the amount of \$2,500.00; and (iii) for such, other further and related relief as the Court deems just, proper and equitable (the "Motion"); and upon said Affirmation of Richard McCord in Support of the Motion [ECF Doc. No. \_\_\_\_]; and upon the

Affidavit of Service of the Motion and Order [ECF Doc. No. ]; and it appearing that the Court has jurisdiction over this matter; and due notice of the Motion and this Order having been served upon the Debtor, Debtor's Counsel, Raymond Verdi, Esq., Alege, Fraser, Juman, the Office of the United States Trustee and all parties that filed a notice of appearance, and after due consideration, it is hereby

**ORDERED**, that the Motion be, and it hereby is, GRANTED, to the extent set forth herein; and it is further

**ORDERED**, that Alege, Fraser, Juman and/or a responsible party of the Debtor, must comply with this Court's Order dated May 28, 2024 and the Subpoenas for Rule 2004 Examination, and turnover all documents reflected on Exhibit A annexed hereto within ten (10) business days of the entry of this Order; and it is further

**ORDERED**, that the Court hereby grants monetary sanctions in favor of the Trustee against the Debtor, Alege, Fraser and Juman, in the amount of \$2,500.00, for legal fees incurred by the Trustee in connection with the Motion, which shall be made payable to Certilman Balin Adler & Hyman, LLP, and remitted in certified funds so as to be received on or before October 30, 2025; and it is further

**ORDERED**, that failure to comply with this Order will result in sanctions against the Debtor, Alege, Fraser and Juman, in the amount of \$1,000.00 per day until the documents are received.

Fraleg Group, Inc.  
Chapter 7  
Case No.: 122-41410-jmm

**EXHIBIT A**

1. Copies of the 2021, 2022 and final Federal and New York State Tax Returns for Fraleg Group, Inc. (the "Debtor");
2. Copies of the 2021, 2022, 2023 and 2024 Bank account statements for all accounts held by the Debtor, including copies of cancelled checks, deposits and wire transfers;
3. Copies of all documents, correspondence, communications relating to the Debtor's purchase of the real properties located at 112 North Walnut Street, East Orange, New Jersey and 116 North Walnut Street, East Orange, New Jersey;